

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

*County of Lake, Ohio v. Purdue
Pharma L.P., et al.*, Case No. 18-op-
45032

*County of Trumbull, Ohio v. Purdue
Pharma L.P., et al.*, Case No. 18-op-
45079

“Track 3 Cases”

MDL No. 2084

Case No. 17-md-2804

Judge Dan Aaron Polster

**WALMART INC.’S ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF’S
SUPPLEMENTAL AND AMENDED ALLEGATIONS TO BE ADDED TO SHORT
FORM FOR SUPPLEMENTING COMPLAINT AND AMENDING DEFENDANTS**

Defendant Walmart Inc. (“Walmart”) hereby answers the Supplemental and Amended Allegations to Be Added to Short Form for Supplementing Complaint and Amending Defendants and Jury Demand (“Supplemental Short Form Complaint”) filed in the case of *County of Lake, Ohio v. Purdue Pharma, L.P., et al.*, Case No. 18-op-45032 (*In re Nat’l Prescription Opiate Litig.*, Case No. 17-md-2804 (N.D. Ohio), ECF No. 3327).¹

Unless expressly stated otherwise, Walmart denies each and every allegation in the Complaint, including any allegations in the preamble, unnumbered and numbered paragraphs, titles, headings, subheadings, table of contents, footnotes, exhibits, characterization of documents,

¹ Pursuant to Section C of the Track Three Case Management Order (ECF No. 3325 & 3329), and with the Special Master’s approval, the parties have agreed that (1) Defendants will answer the Supplemental and Amended Allegations to Be Added to Short Form for Supplementing Complaint and Amending Defendants and Jury Demand (ECF No. 3327), (2) Defendants will not answer the prior complaints filed by Plaintiff, and (3) by not answering those prior complaints, Defendants do not admit any of the allegations in those complaints or risk default judgment with respect to any claims in those complaints.

and stricken paragraphs, and specifically denies any liability to Plaintiff. To the extent not expressly denied, all allegations for which Walmart denies possessing knowledge or information sufficient to form a belief are denied. Walmart reserves the right to seek to amend and supplement its Answer as may be appropriate or necessary.

1. Paragraph 1, which summarizes Plaintiff's claims, does not require a response. To the extent a response is required, Walmart denies that Plaintiff is entitled to relief on the claims asserted against Walmart and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

2. Walmart acknowledges that abuse of and addiction to opioids is a serious public health issue. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2; such allegations are therefore deemed to be denied.

3. Walmart acknowledges that abuse of and addiction to opioids is a serious public health issue. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3; such allegations are therefore deemed to be denied.

4. While Walmart is aware of reports regarding drug overdose, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4; such allegations are therefore deemed to be denied.

5. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 5; such allegations are therefore deemed to be denied.

6. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 6; such allegations are therefore deemed to be denied.

7. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 7; such allegations are therefore deemed to be denied.

8. To the extent Paragraph 8 refers to documents,² those documents speak for themselves, and Walmart denies any characterizations thereof. Walmart admits that, according to www.whitehouse.gov, the President declared the opioid crisis a national public health emergency on October 26, 2017. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 8, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

9. Walmart denies the allegations in Paragraph 9 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 9, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

10. Paragraph 10 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 10 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the

² As used by Walmart in this Answer, “document” and/or “documents” include, without limitation, writings, recordings, photographs, and electronically stored information, as well as websites, message boards, videos, CME presentations and materials, programs, literature, and all other sources used in support of each allegation.

allegations in Paragraph 10, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

11. While Walmart is aware of reports regarding drug overdose, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 11; such allegations are therefore deemed to be denied.

12. Paragraph 12 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 12 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 12, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

13. Paragraph 13 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Further, Paragraph 13 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 13 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

14. Paragraph 14 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 14 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 14, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

15. Walmart denies the allegations in Paragraph 15 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

16. Walmart denies the allegations in Paragraph 16 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

17. Walmart denies the allegations in Paragraph 17 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 17, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

18. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 18; such allegations are therefore deemed to be denied.

19. Paragraph 19 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 19 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 19, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

20. Paragraph 20 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 20 and

further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 20, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

21. Paragraph 21 states legal conclusions to which no response is required. Walmart admits that it is not aware of a reason or basis to dispute the personal jurisdiction of this Court over Walmart for the claims asserted in the Complaint. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 21, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

22. Paragraph 22 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 22 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

23. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 23; such allegations are therefore deemed to be denied.

24. The allegations in Paragraph 24 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 24 is deemed to contain allegations against Walmart, Walmart denies such allegations.

25. The allegations in Paragraph 25 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 25 is deemed to contain allegations against Walmart, Walmart denies such allegations.

26. The allegations in Paragraph 26 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 26 is deemed to contain allegations against Walmart, Walmart denies such allegations.

27. The allegations in Paragraph 27 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 27 is deemed to contain allegations against Walmart, Walmart denies such allegations.

28. The allegations in Paragraph 28 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 28 is deemed to contain allegations against Walmart, Walmart denies such allegations.

29. The allegations in Paragraph 29 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 29 is deemed to contain allegations against Walmart, Walmart denies such allegations.

30. The allegations in Paragraph 30 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 30 is deemed to contain allegations against Walmart, Walmart denies such allegations.

31. The allegations in Paragraph 31 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 31 is deemed to contain allegations against Walmart, Walmart denies such allegations.

32. The allegations in Paragraph 32 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 32 is deemed to contain allegations against Walmart, Walmart denies such allegations.

33. The allegations in Paragraph 33 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 33 is deemed to contain allegations against Walmart, Walmart denies such allegations.

34. The allegations in Paragraph 34 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 34 is deemed to contain allegations against Walmart, Walmart denies such allegations.

35. The allegations in Paragraph 35 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 35 is deemed to contain allegations against Walmart, Walmart denies such allegations.

36. The allegations in Paragraph 36 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 36 is deemed to contain allegations against Walmart, Walmart denies such allegations.

37. The allegations in Paragraph 37 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 37 is deemed to contain allegations against Walmart, Walmart denies such allegations.

38. The allegations in Paragraph 38 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 38 is deemed to contain allegations against Walmart, Walmart denies such allegations.

39. The allegations in Paragraph 39 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 39 is deemed to contain allegations against Walmart, Walmart denies such allegations.

40. The allegations in Paragraph 40 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 40 is deemed to contain allegations against Walmart, Walmart denies such allegations.

41. The allegations in Paragraph 41 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 41 is deemed to contain allegations against Walmart, Walmart denies such allegations.

42. The allegations in Paragraph 42 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 42 is deemed to contain allegations against Walmart, Walmart denies such allegations.

43. The allegations in Paragraph 43 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 43 is deemed to contain allegations against Walmart, Walmart denies such allegations.

44. The allegations in Paragraph 44 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 44 is deemed to contain allegations against Walmart, Walmart denies such allegations.

45. The allegations in Paragraph 45 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 45 is deemed to contain allegations against Walmart, Walmart denies such allegations.

46. The allegations in Paragraph 46 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 46 is deemed to contain allegations against Walmart, Walmart denies such allegations.

47. The allegations in Paragraph 47 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 47 is deemed to contain allegations against Walmart, Walmart denies such allegations.

48. Walmart admits that Walmart Inc. (formerly known as Wal-Mart Stores, Inc.) is a Delaware corporation with a principal place of business in Bentonville, Arkansas.

49. Paragraph 49 concerns an entity that Plaintiff agreed to voluntarily dismiss as a defendant from this action on September 21, 2020, and such allegations do not require a response from Walmart. To the extent such allegations require a response, Walmart admits that Wal-Mart Stores East, LP is a Delaware limited partnership with a principal place of business in Bentonville, Arkansas.

50. Paragraph 50 concerns an entity that Plaintiff agreed to voluntarily dismiss as a defendant from this action on September 21, 2020, and such allegations do not require a response from Walmart. To the extent such allegations require a response, Walmart admits that WSE Management, LLC is a Delaware limited liability company. Walmart also admits that WSE Management, LLC owns one percent of Wal-Mart Store East, LP.

51. Paragraph 51 concerns an entity that Plaintiff agreed to voluntarily dismiss as a defendant from this action on September 21, 2020, and such allegations do not require a response from Walmart. To the extent such allegations require a response, Walmart admits that WSE Investment, LLC is a Delaware limited liability company. Walmart also admits that WSE Investment, LLC owns ninety-nine percent of Wal-Mart Store East, LP.

52. Paragraph 52 concerns an entity that Plaintiff agreed to voluntarily dismiss as a defendant from this action on September 21, 2020, and such allegations do not require a response from Walmart. To the extent such allegations require a response, Walmart admits that Wal-Mart Stores East, LLC (formerly known as Wal-Mart Stores East, Inc.) is an Arkansas limited liability company. Walmart also admits that Wal-Mart Stores East, LLC is the sole member of both WSE Management, LLC and WSE Investment, LLC.

53. Paragraph 53 concerns an entity that Plaintiff agreed to voluntarily dismiss as a defendant from this action on September 21, 2020, and such allegations do not require a response from Walmart. To the extent such allegations require a response, Walmart admits that Walmart Inc. is the sole member of Wal-Mart Stores East, LLC (formerly known as Wal-Mart Stores East, Inc.).

54. Paragraph 54 purports to recite the shorthand terms that Plaintiff defines for its use in its Complaint, and such allegations do not require a response from Walmart. To the extent Paragraph 54 contains allegations of wrongdoing, Walmart denies such allegations.

55. Walmart admits that Walmart, through its subsidiary, distributes certain prescription medication to certain pharmacies operated by Walmart and/or subsidiaries thereof. Walmart also admits that it dispenses certain prescription medication to customers of retail pharmacies operated by Walmart and/or its subsidiaries with valid prescriptions. Walmart denies the remaining allegations in Paragraph 55.

56. Walmart admits that for a time period prior to May 2018, Walmart, through its subsidiary, distributed certain prescription opioid medication to certain pharmacies operated by Walmart and/or subsidiaries thereof located in Ohio and Lake County. Walmart also admits that at times relevant to this litigation it dispensed certain prescription opioid medication to customers

of retail pharmacies operated by Walmart and/or its subsidiaries in Ohio and Lake County with valid prescriptions. Walmart denies the remaining allegations in Paragraph 56.

57. The allegations in Paragraph 57 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 57 is deemed to contain allegations against Walmart, Walmart denies such allegations.

58. The allegations in Paragraph 58 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 58 is deemed to contain allegations against Walmart, Walmart denies such allegations.

59. The allegations in Paragraph 59 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 59 is deemed to contain allegations against Walmart, Walmart denies such allegations.

60. Paragraph 60 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 60 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 60, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

61. Paragraph 61 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 61 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 61, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

62. Walmart admits that opioids are a class of substances that include legal prescription medication such as pain relievers. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 62; such allegations are therefore deemed to be denied.

63. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 63; such allegations are therefore deemed to be denied.

64. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 64; such allegations are therefore deemed to be denied.

65. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 65; such allegations are therefore deemed to be denied.

66. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 66; such allegations are therefore deemed to be denied.

67. Walmart admits that during some time periods some opioids have been regulated as Schedule II controlled substances. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 67; such allegations are therefore deemed to be denied.

68. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 68; such allegations are therefore deemed to be denied.

69. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 69; such allegations are therefore deemed to be denied.

70. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 70; such allegations are therefore deemed to be denied.

71. Walmart denies the allegations in Paragraph 71 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 71, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

72. Walmart denies the allegations in Paragraph 72 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 72, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

73. Paragraph 73 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 73 and

further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 73, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

74. Walmart denies the allegations in Paragraph 74 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 74, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

75. Walmart admits that it does business in many parts of the United States. Walmart further admits that for a time period prior to May 2018, Walmart, through its subsidiary, distributed certain prescription opioid medication to certain retail pharmacies operated by Walmart and/or its subsidiaries. Walmart also admits that it dispensed certain prescription opioid medication to customers of retail pharmacies operated by Walmart and/or its subsidiaries with valid prescriptions. Walmart denies the remaining allegations in Paragraph 75 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

76. Paragraph 76 purports to compile governmentally-disclosed ARCOS data which speaks for itself, and Walmart denies any characterization thereof. Further, Paragraph 76 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 76 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 76, including

to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

77. Walmart admits that at all times relevant to this litigation, it possessed certain data on prescription medication it distributed and dispensed. Walmart denies the remaining allegations in Paragraph 77 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 77, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

78. Paragraph 78 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 78 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 78, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

79. Paragraph 79 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 79 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 79. Further, to the extent Paragraph 79 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

80. Paragraph 80 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 80 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 80, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

81. Paragraph 81 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 81 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 81, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

82. Walmart denies the allegations in Paragraph 82 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 82, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

83. Walmart denies the allegations in Paragraph 83 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 83, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

84. Walmart denies the allegations in Paragraph 84 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 84, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

85. Walmart denies the allegations in Paragraph 85 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth

of the allegations in Paragraph 85, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

86. Walmart denies the allegations in Paragraph 86 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 86, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

87. Paragraph 87 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 87 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 87, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

88. Paragraph 88 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 88 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 88, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

89. Paragraph 89 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 89 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 89, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

90. Paragraph 90 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 90 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 90. Further, to the extent Paragraph 90 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

91. Paragraph 91 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 91 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 91. Further, to the extent Paragraph 91 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

92. Paragraph 92 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 92 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 92. Walmart admits that the pharmacies operated by Walmart and/or its subsidiaries are registrants under the Controlled Substances Act. Further, to the extent Paragraph 92 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

93. Paragraph 93 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 93 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 93. Walmart admits that the pharmacies operated by Walmart and/or its subsidiaries are

registrants under the Controlled Substances Act. Further, to the extent Paragraph 93 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

94. Paragraph 94 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 94 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 94, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

95. Paragraph 95 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 95 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

96. Paragraph 96 refers to documents and purports to recite law that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 96 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 96, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

97. Paragraph 97 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 97 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is

otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 97, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

98. Paragraph 98 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 98 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 98. Further, to the extent Paragraph 98 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

99. Paragraph 99 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 99 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 99, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

100. Paragraph 100 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 100 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

101. Paragraph 101 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 101 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in

Paragraph 101. Further, to the extent Paragraph 101 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

102. Paragraph 102 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 102 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 102. Further, to the extent Paragraph 102 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

103. Walmart admits that at times relevant to this litigation, it possessed certain data on prescription medication it distributed and dispensed, including both controlled and non-controlled substances. Walmart denies the remaining allegations in Paragraph 103.

104. Paragraph 104 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 104 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 104. Further, to the extent Paragraph 104 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

105. Paragraph 105 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 105 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 105, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

106. Paragraph 106 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, Paragraph 106 states legal conclusions to which no response is

required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 106 and further denies the allegations contained therein.

107. Paragraph 107 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 107 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 107, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

108. Paragraph 108 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 108 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 108. Further, to the extent Paragraph 108 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

109. Paragraph 109 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 109 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 109. Further, to the extent Paragraph 109 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

110. Paragraph 110 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 110 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

111. Paragraph 111 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 111 and

further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 111, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

112. Paragraph 112 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 112 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 112, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

113. Paragraph 113 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 113 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 113, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

114. Paragraph 114 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 114 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 114, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

115. Paragraph 115 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 115 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 115, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

116. Paragraph 116 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 116 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 116, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

117. Paragraph 117 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 117 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 117, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

118. Paragraph 118 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 118. Further, to the extent Paragraph 118 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

119. Paragraph 119 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 119 to the extent

they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

120. Walmart denies the allegations in Paragraph 120 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 120, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

121. Walmart admits that at times relevant to this litigation, it was a member of NACDS. Walmart also admits that at certain times, certain Walmart employees have served on the NACDS Board of Directors. Paragraph 121 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 121 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 121, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

122. Walmart admits that HDA is a trade association that represents wholesale distributors. Walmart also admits that HDA has at certain times worked together with NACDS on certain issues. Walmart denies that it is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 122, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

123. Paragraph 123 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to

form a belief as to the truth of the allegations in Paragraph 123, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

124. Paragraph 124 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 124 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 124, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

125. Paragraph 125 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 125 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 125, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

126. Paragraph 126 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 126 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 126, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

127. Paragraph 127 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 127 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form

a belief as to the truth of the allegations in Paragraph 127, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

128. Paragraph 128 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 128; such allegations are therefore deemed to be denied.

129. To the extent Paragraph 129 refers to documents, those documents speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 129 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 129, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

130. Paragraph 130 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Paragraph 130 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 130. Further, to the extent Paragraph 130 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

131. Paragraph 131 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 131; such allegations are therefore deemed to be denied.

132. To the extent Paragraph 132 refers to documents, those documents speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining

allegations in Paragraph 132 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 132, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

133. Paragraph 133 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 133; such allegations are therefore deemed to be denied.

134. Paragraph 134 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 134 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 134, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

135. Paragraph 135 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 135 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 135, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

136. Paragraph 136 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 136 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 136, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

137. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 137, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

138. Walmart denies the allegations in Paragraph 138 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 138, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

139. Paragraph 139 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 139 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 139, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

140. Paragraph 140 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 140 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 140. Further, to the extent Paragraph 140 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

141. To the extent Paragraph 141 refers to documents, those documents speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 141 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 141, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

142. Paragraph 142 refers to a document and purports to recite law that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 142 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 142, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

143. Paragraph 143 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 143; such allegations are therefore deemed to be denied.

144. Paragraph 144 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 144; such allegations are therefore deemed to be denied.

145. The allegations in Paragraph 145 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 145 is deemed to contain allegations against Walmart, Walmart denies such allegations.

146. To the extent Paragraph 146 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

147. Paragraph 147 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, Paragraph 147 states legal conclusions to which no response is

required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 147 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 147, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

148. Paragraph 148 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 148, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

149. Walmart admits that at times relevant to this litigation, it possessed certain data on prescription medication it distributed and dispensed, including both controlled and non-controlled substances. Further, Paragraph 149 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 149 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 149, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

150. Paragraph 150 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 150; such allegations are therefore deemed to be denied.

151. Paragraph 151 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 151 also states legal conclusions to which no response is

required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 151. Further, to the extent Paragraph 151 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

152. Paragraph 152 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 152, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

153. Paragraph 153 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 153; such allegations are therefore deemed to be denied.

154. Walmart admits that at times relevant to this litigation, it possessed certain data on prescription medication it distributed and dispensed, including both controlled and non-controlled substances. Walmart denies the remaining allegations in Paragraph 154 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 154, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

155. Walmart admits that it produced certain dispensing data in the MDL in March 2020. Walmart denies the remaining allegations in Paragraph 155.

156. Paragraph 156 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 156 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 156, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

157. The allegations in Paragraph 157 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 157 is deemed to contain allegations against Walmart, Walmart denies such allegations.

158. The allegations in Paragraph 158 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 158 is deemed to contain allegations against Walmart, Walmart denies such allegations.

159. The allegations in Paragraph 159 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 159 is deemed to contain allegations against Walmart, Walmart denies such allegations.

160. The allegations in Paragraph 160 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 160 is deemed to contain allegations against Walmart, Walmart denies such allegations.

161. The allegations in Paragraph 161 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 161 is deemed to contain allegations against Walmart, Walmart denies such allegations.

162. The allegations in Paragraph 162 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 162 is deemed to contain allegations against Walmart, Walmart denies such allegations.

163. The allegations in Paragraph 163 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 163 is deemed to contain allegations against Walmart, Walmart denies such allegations.

164. The allegations in Paragraph 164 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 164 is deemed to contain allegations against Walmart, Walmart denies such allegations.

165. The allegations in Paragraph 165 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 165 is deemed to contain allegations against Walmart, Walmart denies such allegations.

166. The allegations in Paragraph 166 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 166 is deemed to contain allegations against Walmart, Walmart denies such allegations.

167. The allegations in Paragraph 167 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 167 is deemed to contain allegations against Walmart, Walmart denies such allegations.

168. The allegations in Paragraph 168 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 168 is deemed to contain allegations against Walmart, Walmart denies such allegations.

169. The allegations in Paragraph 169 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 169 is deemed to contain allegations against Walmart, Walmart denies such allegations.

170. The allegations in Paragraph 170 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 170 is deemed to contain allegations against Walmart, Walmart denies such allegations.

171. The allegations in Paragraph 171 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 171 is deemed to contain allegations against Walmart, Walmart denies such allegations.

172. The allegations in Paragraph 172 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 172 is deemed to contain allegations against Walmart, Walmart denies such allegations.

173. The allegations in Paragraph 173 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 173 is deemed to contain allegations against Walmart, Walmart denies such allegations.

174. The allegations in Paragraph 174 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 174 is deemed to contain allegations against Walmart, Walmart denies such allegations.

175. The allegations in Paragraph 175 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 175 is deemed to contain allegations against Walmart, Walmart denies such allegations.

176. The allegations in Paragraph 176 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 176 is deemed to contain allegations against Walmart, Walmart denies such allegations.

177. The allegations in Paragraph 177 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 177 is deemed to contain allegations against Walmart, Walmart denies such allegations.

178. The allegations in Paragraph 178 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 178 is deemed to contain allegations against Walmart, Walmart denies such allegations.

179. The allegations in Paragraph 179 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 179 is deemed to contain allegations against Walmart, Walmart denies such allegations.

180. The allegations in Paragraph 180 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 180 is deemed to contain allegations against Walmart, Walmart denies such allegations.

181. The allegations in Paragraph 181 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 181 is deemed to contain allegations against Walmart, Walmart denies such allegations.

182. The allegations in Paragraph 182 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 182 is deemed to contain allegations against Walmart, Walmart denies such allegations.

183. The allegations in Paragraph 183 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 183 is deemed to contain allegations against Walmart, Walmart denies such allegations.

184. The allegations in Paragraph 184 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 184 is deemed to contain allegations against Walmart, Walmart denies such allegations.

185. The allegations in Paragraph 185 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 185 is deemed to contain allegations against Walmart, Walmart denies such allegations.

186. The allegations in Paragraph 186 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 186 is deemed to contain allegations against Walmart, Walmart denies such allegations.

187. The allegations in Paragraph 187 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 187 is deemed to contain allegations against Walmart, Walmart denies such allegations.

188. The allegations in Paragraph 188 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 188 is deemed to contain allegations against Walmart, Walmart denies such allegations.

189. The allegations in Paragraph 189 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 189 is deemed to contain allegations against Walmart, Walmart denies such allegations.

190. The allegations in Paragraph 190 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 190 is deemed to contain allegations against Walmart, Walmart denies such allegations.

191. The allegations in Paragraph 191 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 191 is deemed to contain allegations against Walmart, Walmart denies such allegations.

177. The allegations in this paragraph, incorrectly numbered as Paragraph 177, are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to

their truth; such allegations are therefore deemed to be denied. Moreover, to the extent this paragraph is deemed to contain allegations against Walmart, Walmart denies such allegations.

192. The allegations in Paragraph 192 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 192 is deemed to contain allegations against Walmart, Walmart denies such allegations.

193. The allegations in Paragraph 193 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 193 is deemed to contain allegations against Walmart, Walmart denies such allegations.

194. The allegations in Paragraph 194 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 194 is deemed to contain allegations against Walmart, Walmart denies such allegations.

195. The allegations in Paragraph 195 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 195 is deemed to contain allegations against Walmart, Walmart denies such allegations.

196. The allegations in Paragraph 196 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 196 is deemed to contain allegations against Walmart, Walmart denies such allegations.

197. The allegations in Paragraph 197 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 197 is deemed to contain allegations against Walmart, Walmart denies such allegations.

198. The allegations in Paragraph 198 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 198 is deemed to contain allegations against Walmart, Walmart denies such allegations.

199. The allegations in Paragraph 199 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 199 is deemed to contain allegations against Walmart, Walmart denies such allegations.

200. The allegations in Paragraph 200 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 200 is deemed to contain allegations against Walmart, Walmart denies such allegations.

201. The allegations in Paragraph 201 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 201 is deemed to contain allegations against Walmart, Walmart denies such allegations.

202. The allegations in Paragraph 202 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 202 is deemed to contain allegations against Walmart, Walmart denies such allegations.

203. The allegations in Paragraph 203 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 203 is deemed to contain allegations against Walmart, Walmart denies such allegations.

204. The allegations in Paragraph 204 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 204 is deemed to contain allegations against Walmart, Walmart denies such allegations.

205. The allegations in Paragraph 205 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 205 is deemed to contain allegations against Walmart, Walmart denies such allegations.

206. The allegations in Paragraph 206 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 206 is deemed to contain allegations against Walmart, Walmart denies such allegations.

207. The allegations in Paragraph 207 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 207 is deemed to contain allegations against Walmart, Walmart denies such allegations.

208. The allegations in Paragraph 208 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 208 is deemed to contain allegations against Walmart, Walmart denies such allegations.

209. The allegations in Paragraph 209 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 209 is deemed to contain allegations against Walmart, Walmart denies such allegations.

210. The allegations in Paragraph 210 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 210 is deemed to contain allegations against Walmart, Walmart denies such allegations.

211. The allegations in Paragraph 211 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 211 is deemed to contain allegations against Walmart, Walmart denies such allegations.

212. The allegations in Paragraph 212 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 212 is deemed to contain allegations against Walmart, Walmart denies such allegations.

213. The allegations in Paragraph 213 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 213 is deemed to contain allegations against Walmart, Walmart denies such allegations.

214. The allegations in Paragraph 214 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 214 is deemed to contain allegations against Walmart, Walmart denies such allegations.

215. The allegations in Paragraph 215 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 215 is deemed to contain allegations against Walmart, Walmart denies such allegations.

216. The allegations in Paragraph 216 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 216 is deemed to contain allegations against Walmart, Walmart denies such allegations.

217. The allegations in Paragraph 217 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 217 is deemed to contain allegations against Walmart, Walmart denies such allegations.

218. The allegations in Paragraph 218 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 218 is deemed to contain allegations against Walmart, Walmart denies such allegations.

219. The allegations in Paragraph 219 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 219 is deemed to contain allegations against Walmart, Walmart denies such allegations.

220. The allegations in Paragraph 220 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 220 is deemed to contain allegations against Walmart, Walmart denies such allegations.

221. The allegations in Paragraph 221 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 221 is deemed to contain allegations against Walmart, Walmart denies such allegations.

222. The allegations in Paragraph 222 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 222 is deemed to contain allegations against Walmart, Walmart denies such allegations.

223. The allegations in Paragraph 223 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 223 is deemed to contain allegations against Walmart, Walmart denies such allegations.

224. The allegations in Paragraph 224 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 224 is deemed to contain allegations against Walmart, Walmart denies such allegations.

225. The allegations in Paragraph 225 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 225 is deemed to contain allegations against Walmart, Walmart denies such allegations.

226. The allegations in Paragraph 226 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 226 is deemed to contain allegations against Walmart, Walmart denies such allegations.

227. The allegations in Paragraph 227 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 227 is deemed to contain allegations against Walmart, Walmart denies such allegations.

228. The allegations in Paragraph 228 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 228 is deemed to contain allegations against Walmart, Walmart denies such allegations.

229. The allegations in Paragraph 229 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 229 is deemed to contain allegations against Walmart, Walmart denies such allegations.

230. The allegations in Paragraph 230 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 230 is deemed to contain allegations against Walmart, Walmart denies such allegations.

231. The allegations in Paragraph 231 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 231 is deemed to contain allegations against Walmart, Walmart denies such allegations.

232. The allegations in Paragraph 232 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 232 is deemed to contain allegations against Walmart, Walmart denies such allegations.

233. The allegations in Paragraph 233 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 233 is deemed to contain allegations against Walmart, Walmart denies such allegations.

234. The allegations in Paragraph 234 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 234 is deemed to contain allegations against Walmart, Walmart denies such allegations.

235. The allegations in Paragraph 235 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 235 is deemed to contain allegations against Walmart, Walmart denies such allegations.

236. The allegations in Paragraph 236 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 236 is deemed to contain allegations against Walmart, Walmart denies such allegations.

237. The allegations in Paragraph 237 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 237 is deemed to contain allegations against Walmart, Walmart denies such allegations.

238. The allegations in Paragraph 238 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 238 is deemed to contain allegations against Walmart, Walmart denies such allegations.

239. The allegations in Paragraph 239 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 239 is deemed to contain allegations against Walmart, Walmart denies such allegations.

240. The allegations in Paragraph 240 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 240 is deemed to contain allegations against Walmart, Walmart denies such allegations.

241. The allegations in Paragraph 241 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 241 is deemed to contain allegations against Walmart, Walmart denies such allegations.

242. The allegations in Paragraph 242 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 242 is deemed to contain allegations against Walmart, Walmart denies such allegations.

243. The allegations in Paragraph 243 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 243 is deemed to contain allegations against Walmart, Walmart denies such allegations.

244. The allegations in Paragraph 244 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 244 is deemed to contain allegations against Walmart, Walmart denies such allegations.

245. The allegations in Paragraph 245 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 245 is deemed to contain allegations against Walmart, Walmart denies such allegations.

246. The allegations in Paragraph 246 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 246 is deemed to contain allegations against Walmart, Walmart denies such allegations.

247. The allegations in Paragraph 247 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 247 is deemed to contain allegations against Walmart, Walmart denies such allegations.

248. The allegations in Paragraph 248 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 248 is deemed to contain allegations against Walmart, Walmart denies such allegations.

249. The allegations in Paragraph 249 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 249 is deemed to contain allegations against Walmart, Walmart denies such allegations.

250. The allegations in Paragraph 250 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 250 is deemed to contain allegations against Walmart, Walmart denies such allegations.

251. The allegations in Paragraph 251 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 251 is deemed to contain allegations against Walmart, Walmart denies such allegations.

252. The allegations in Paragraph 252 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 252 is deemed to contain allegations against Walmart, Walmart denies such allegations.

253. The allegations in Paragraph 253 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 253 is deemed to contain allegations against Walmart, Walmart denies such allegations.

254. The allegations in Paragraph 254 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 254 is deemed to contain allegations against Walmart, Walmart denies such allegations.

255. The allegations in Paragraph 255 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 255 is deemed to contain allegations against Walmart, Walmart denies such allegations.

256. The allegations in Paragraph 256 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 256 is deemed to contain allegations against Walmart, Walmart denies such allegations.

257. The allegations in Paragraph 257 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 257 is deemed to contain allegations against Walmart, Walmart denies such allegations.

258. The allegations in Paragraph 258 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 258 is deemed to contain allegations against Walmart, Walmart denies such allegations.

259. The allegations in Paragraph 259 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 259 is deemed to contain allegations against Walmart, Walmart denies such allegations.

260. The allegations in Paragraph 260 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 260 is deemed to contain allegations against Walmart, Walmart denies such allegations.

261. The allegations in Paragraph 261 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 261 is deemed to contain allegations against Walmart, Walmart denies such allegations.

262. The allegations in Paragraph 262 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 262 is deemed to contain allegations against Walmart, Walmart denies such allegations.

263. The allegations in Paragraph 263 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 263 is deemed to contain allegations against Walmart, Walmart denies such allegations.

264. The allegations in Paragraph 264 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 264 is deemed to contain allegations against Walmart, Walmart denies such allegations.

265. The allegations in Paragraph 265 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 265 is deemed to contain allegations against Walmart, Walmart denies such allegations.

266. The allegations in Paragraph 266 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 266 is deemed to contain allegations against Walmart, Walmart denies such allegations.

267. The allegations in Paragraph 267 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 267 is deemed to contain allegations against Walmart, Walmart denies such allegations.

268. The allegations in Paragraph 268 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 268 is deemed to contain allegations against Walmart, Walmart denies such allegations.

269. The allegations in Paragraph 269 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 269 is deemed to contain allegations against Walmart, Walmart denies such allegations.

270. The allegations in Paragraph 270 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 270 is deemed to contain allegations against Walmart, Walmart denies such allegations.

271. The allegations in Paragraph 271 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 271 is deemed to contain allegations against Walmart, Walmart denies such allegations.

272. The allegations in Paragraph 272 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 272 is deemed to contain allegations against Walmart, Walmart denies such allegations.

273. Paragraph 273 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 273 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 273, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

274. Paragraph 274 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 274, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

275. The allegations in Paragraph 275 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 275 is deemed to contain allegations against Walmart, Walmart denies such allegations.

276. The allegations in Paragraph 276 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 276 is deemed to contain allegations against Walmart, Walmart denies such allegations.

277. The allegations in Paragraph 277 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without

knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 277 is deemed to contain allegations against Walmart, Walmart denies such allegations.

278. The allegations in Paragraph 278 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 278 is deemed to contain allegations against Walmart, Walmart denies such allegations.

279. The allegations in Paragraph 279 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 279 is deemed to contain allegations against Walmart, Walmart denies such allegations.

280. The allegations in Paragraph 280 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 280 is deemed to contain allegations against Walmart, Walmart denies such allegations.

281. The allegations in Paragraph 281 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 281 is deemed to contain allegations against Walmart, Walmart denies such allegations.

282. The allegations in Paragraph 282 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 282 is deemed to contain allegations against Walmart, Walmart denies such allegations.

283. The allegations in Paragraph 283 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 283 is deemed to contain allegations against Walmart, Walmart denies such allegations.

284. The allegations in Paragraph 284 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 284 is deemed to contain allegations against Walmart, Walmart denies such allegations.

285. The allegations in Paragraph 285 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 285 is deemed to contain allegations against Walmart, Walmart denies such allegations.

286. The allegations in Paragraph 286 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 286 is deemed to contain allegations against Walmart, Walmart denies such allegations.

287. The allegations in Paragraph 287 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 287 is deemed to contain allegations against Walmart, Walmart denies such allegations.

288. The allegations in Paragraph 288 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 288 is deemed to contain allegations against Walmart, Walmart denies such allegations.

289. The allegations in Paragraph 289 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 289 is deemed to contain allegations against Walmart, Walmart denies such allegations.

290. The allegations in Paragraph 290 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 290 is deemed to contain allegations against Walmart, Walmart denies such allegations.

291. The allegations in Paragraph 291 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 291 is deemed to contain allegations against Walmart, Walmart denies such allegations.

292. The allegations in Paragraph 292 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 292 is deemed to contain allegations against Walmart, Walmart denies such allegations.

293. The allegations in Paragraph 293 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 293 is deemed to contain allegations against Walmart, Walmart denies such allegations.

294. The allegations in Paragraph 294 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 294 is deemed to contain allegations against Walmart, Walmart denies such allegations.

295. The allegations in Paragraph 295 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 295 is deemed to contain allegations against Walmart, Walmart denies such allegations.

296. The allegations in Paragraph 296 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 296 is deemed to contain allegations against Walmart, Walmart denies such allegations.

297. The allegations in Paragraph 297 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 297 is deemed to contain allegations against Walmart, Walmart denies such allegations.

298. The allegations in Paragraph 298 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 298 is deemed to contain allegations against Walmart, Walmart denies such allegations.

e. The allegations in this paragraph, incorrectly numbered as Paragraph e, are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent this paragraph is deemed to contain allegations against Walmart, Walmart denies such allegations.

299. The allegations in Paragraph 299 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 299 is deemed to contain allegations against Walmart, Walmart denies such allegations.

300. The allegations in Paragraph 300 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 300 is deemed to contain allegations against Walmart, Walmart denies such allegations.

301. The allegations in Paragraph 301 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 301 is deemed to contain allegations against Walmart, Walmart denies such allegations.

302. The allegations in Paragraph 302 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 302 is deemed to contain allegations against Walmart, Walmart denies such allegations.

303. The allegations in Paragraph 303 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 303 is deemed to contain allegations against Walmart, Walmart denies such allegations.

304. The allegations in Paragraph 304 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 304 is deemed to contain allegations against Walmart, Walmart denies such allegations.

305. The allegations in Paragraph 305 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 305 is deemed to contain allegations against Walmart, Walmart denies such allegations.

306. The allegations in Paragraph 306 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 306 is deemed to contain allegations against Walmart, Walmart denies such allegations.

307. The allegations in Paragraph 307 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 307 is deemed to contain allegations against Walmart, Walmart denies such allegations.

308. The allegations in Paragraph 308 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 308 is deemed to contain allegations against Walmart, Walmart denies such allegations.

309. The allegations in Paragraph 309 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 309 is deemed to contain allegations against Walmart, Walmart denies such allegations.

310. The allegations in Paragraph 310 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 310 is deemed to contain allegations against Walmart, Walmart denies such allegations.

311. The allegations in Paragraph 311 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 311 is deemed to contain allegations against Walmart, Walmart denies such allegations.

312. The allegations in Paragraph 312 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 312 is deemed to contain allegations against Walmart, Walmart denies such allegations.

313. The allegations in Paragraph 313 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 313 is deemed to contain allegations against Walmart, Walmart denies such allegations.

314. The allegations in Paragraph 314 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 314 is deemed to contain allegations against Walmart, Walmart denies such allegations.

315. The allegations in Paragraph 315 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 315 is deemed to contain allegations against Walmart, Walmart denies such allegations.

316. The allegations in Paragraph 316 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 316 is deemed to contain allegations against Walmart, Walmart denies such allegations.

317. The allegations in Paragraph 317 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 317 is deemed to contain allegations against Walmart, Walmart denies such allegations.

318. The allegations in Paragraph 318 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 318 is deemed to contain allegations against Walmart, Walmart denies such allegations.

319. The allegations in Paragraph 319 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 319 is deemed to contain allegations against Walmart, Walmart denies such allegations.

320. The allegations in Paragraph 320 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 320 is deemed to contain allegations against Walmart, Walmart denies such allegations.

321. The allegations in Paragraph 321 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 321 is deemed to contain allegations against Walmart, Walmart denies such allegations.

322. The allegations in Paragraph 322 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 322 is deemed to contain allegations against Walmart, Walmart denies such allegations.

323. The allegations in Paragraph 323 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 323 is deemed to contain allegations against Walmart, Walmart denies such allegations.

324. The allegations in Paragraph 324 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 324 is deemed to contain allegations against Walmart, Walmart denies such allegations.

325. The allegations in Paragraph 325 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 325 is deemed to contain allegations against Walmart, Walmart denies such allegations.

326. The allegations in Paragraph 326 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 326 is deemed to contain allegations against Walmart, Walmart denies such allegations.

327. The allegations in Paragraph 327 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 327 is deemed to contain allegations against Walmart, Walmart denies such allegations.

328. The allegations in Paragraph 328 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 328 is deemed to contain allegations against Walmart, Walmart denies such allegations.

329. The allegations in Paragraph 329 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 329 is deemed to contain allegations against Walmart, Walmart denies such allegations.

330. The allegations in Paragraph 330 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 330 is deemed to contain allegations against Walmart, Walmart denies such allegations.

331. The allegations in Paragraph 331 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 331 is deemed to contain allegations against Walmart, Walmart denies such allegations.

332. The allegations in Paragraph 332 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 332 is deemed to contain allegations against Walmart, Walmart denies such allegations.

333. The allegations in Paragraph 333 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 333 is deemed to contain allegations against Walmart, Walmart denies such allegations.

334. Walmart admits that, upon information and belief, Walmart, through its subsidiaries, is the largest private employer in the United States, employing more than 1.5 million people. Walmart denies the remaining allegations in Paragraph 334.

335. Walmart admits that for a time period prior to May 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedule II to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart further

admits that for a time period prior to July 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedules III through V to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart also admits that it dispensed certain prescription controlled substances to customers of certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States with valid prescriptions. Walmart denies the remaining allegations in Paragraph 335.

336. Walmart denies the allegations in Paragraph 336.

337. Walmart admits that employees at Walmart's pharmacy distribution centers monitored orders and alerted managers of potential issues, who would follow up on orders by speaking with pharmacists, and escalate issues to market and/or region leadership or other Walmart employees as needed to investigate orders and/or resolve concerns. Walmart denies the remaining allegations in Paragraph 337.

338. Walmart denies the allegations in Paragraph 338.

339. Walmart denies the allegations in Paragraph 339.

340. Walmart admits that from approximately 2011 until approximately 2015, Walmart implemented order alerts in Reddwerks (Walmart's order fulfillment system) that supplemented existing processes, policies and procedures for order monitoring. Walmart denies the remaining allegations in Paragraph 340.

341. Walmart admits that, from 2011 until approximately 2015, Walmart implemented order alerts in Reddwerks (Walmart's order fulfillment system) that flagged orders for controlled substances of 50 bottles or more and orders for amounts 30% higher than a rolling 4-week average for that item. Walmart also admits, that from approximately July 2012 until approximately 2015, Walmart also implemented a hard limit of 20 bottles for shipments of Oxycodone 30 mg and

internally circulated a report listing orders for Schedule II controlled substances of more than 20 bottles for further review and follow-up as needed. Walmart denies the remaining allegations in Paragraph 341.

342. Walmart denies the allegations in Paragraph 342 and further denies that Plaintiff has accurately stated Walmart's obligations under the law.

343. Walmart admits that in mid-2012 Walmart implemented a hard limit of 20 bottles for orders of Oxycodone 30 mg in addition to its other order monitoring processes, policies and procedures. Walmart denies the remaining allegations in Paragraph 343 and further denies that plaintiff has accurately stated Walmart's obligations under the law.

344. Walmart admits that in mid-2012, Walmart also monitored weekly orders for Schedule II controlled substances of more than 20 bottles. Walmart further admits that Walmart internally circulated a report listing orders for Schedule II controlled substances of more than 20 bottles for further review and follow-up as needed. Walmart denies the remaining allegations in Paragraph 344.

345. Walmart denies the allegations in this Paragraph and affirmatively states that Walmart pharmacies were required to place all orders for Schedule II controlled substances through Walmart's Schedule II controlled substance distribution center. Walmart further affirmatively states that if Walmart's Schedule II controlled substances distribution center did not carry the ordered item or it was out of stock, the order placed with Walmart's controlled substances distribution center could be routed by Walmart's controlled substances distribution center to be fulfilled by a third-party distributor. Walmart admits that during certain periods of time the third-party distributor described above was McKesson for Walmart pharmacies located in Ohio. Walmart denies the remaining allegations in Paragraph 345.

346. Paragraph 346 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Paragraph 346 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 346 and further denies the allegations contained therein.

347. Walmart admits that the term “orders of interest” was not used in Walmart’s written policies and procedures until 2014, but denies that Walmart did not hold or investigate orders prior to 2014 and denies that it did not have written policies addressing order monitoring prior to 2014. Walmart further denies any remaining allegations in Paragraph 347.

348. Walmart admits that, in 2015, Walmart implemented store-item specific thresholds as part of its order monitoring system. These store-item specific thresholds were generally calculated based on the store’s weekly average for that item plus three standard deviations based on 52 weeks of shipment data for that store. Walmart admits that these store-specific thresholds included certain minimum and maximum thresholds. Walmart denies the remaining allegations in Paragraph 348.

349. Walmart denies the allegations in Paragraph 349.

350. Paragraph 350 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 350.

351. Paragraph 351 purports to compile governmentally-disclosed ARCOS data which speaks for itself, and Walmart denies any characterization thereof. Further, Paragraph 351 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 351 and further denies the allegations contained therein.

352. Paragraph 352 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 352 and further denies the allegations contained therein.

353. Walmart admits that for a time period prior to May 2018, Walmart, through its subsidiary, distributed certain prescription opioid medication to certain retail pharmacies operated by Walmart and/or its subsidiaries in states other than Ohio. Walmart also admits that it dispensed certain prescription opioid medication to customers of certain retail pharmacies operated by Walmart and/or its subsidiaries in states other than Ohio with valid prescriptions. Walmart denies the remaining allegations in Paragraph 353.

354. Paragraph 354 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 354 and further denies the allegations contained therein.

355. Paragraph 355 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 355 and further denies the allegations contained therein.

356. Paragraph 356 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 356 and further denies the allegations contained therein.

357. Paragraph 357 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 357 and further denies the allegations contained therein.

358. Paragraph 358 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 358 and further denies the allegations contained therein.

359. Walmart denies the allegations in Paragraph 359.

360. Paragraph 360 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 360 and further denies the allegations contained therein.

361. Paragraph 361 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 361 and further denies the allegations contained therein.

362. Walmart admits that Walmart and/or its subsidiaries operated retail pharmacies at certain locations in the United States. Walmart also admits that Walmart, through its subsidiary, currently has six pharmacy distribution centers that distribute certain non-controlled prescription medication to certain pharmacies operated by Walmart and/or its subsidiaries. Walmart further admits that Walmart and/or its subsidiaries operated a mail-order pharmacy and a specialty pharmacy, but denies that those pharmacies were located in the County. Walmart denies the remaining allegations in Paragraph 362.

363. Paragraph 363 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart admits that it provided its pharmacists with a variety of resources to aid in their use of their professional judgment, including policies and training that provided guidance on, among other topics, potential prescriber, patient, and prescription red flags. Walmart denies the remaining allegations in Paragraph 363.

364. Walmart admits that during the time period it self-distributed controlled substances, Walmart, through its subsidiary, distributed certain prescription medication to certain pharmacies operated by Walmart and/or subsidiaries thereof. Walmart also admits that under certain circumstances a third-party distributor may have filled orders for certain prescription medications placed by certain Walmart pharmacies. Walmart denies the remaining allegations in Paragraph 364, including that Walmart pharmacies were able to have the same order for prescription medication filled by both Walmart and a third-party distributor.

365. Paragraph 365 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 365 and further denies the allegations contained therein.

366. Paragraph 366 purports to compile governmentally-disclosed ARCOS data which speaks for itself, and Walmart denies any characterization thereof. Further, Paragraph 366 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 366 and further denies the allegations contained therein.

367. Paragraph 367 purports to compile governmentally-disclosed ARCOS data which speaks for itself, and Walmart denies any characterization thereof. Further, Paragraph 367 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 367 and further denies the allegations contained therein.

368. Paragraph 368 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 368 and further denies the allegations contained therein.

369. Paragraph 369 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 369 and further denies the allegations contained therein.

370. Walmart admits that at times relevant to this litigation, it possessed certain data on prescription opioid medication it distributed to its own pharmacies. Walmart denies the remaining allegations in Paragraph 370.

371. Walmart admits that at times relevant to this litigation, it possessed certain data on prescription opioid medication dispensed by Walmart pharmacists at its own pharmacies. Walmart denies the remaining allegations in Paragraph 371.

372. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 372; such allegations are therefore deemed to be denied.

373. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 373; such allegations are therefore deemed to be denied.

374. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 374; such allegations are therefore deemed to be denied.

375. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 375; such allegations are therefore deemed to be denied.

376. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 376; such allegations are therefore deemed to be denied.

377. Walmart admits that prior to 2013, Walmart pharmacists' bonus compensation was based on multiple considerations, including, among other things, the aggregate of all prescriptions filled by the pharmacist's store. Walmart also admits that in 2013, Walmart removed controlled substance prescriptions from any prescription count component of bonus compensation for Walmart pharmacists. Walmart denies the remaining allegations in Paragraph 377.

378. Paragraph 378 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. During all relevant times, Walmart pharmacists were permitted and encouraged to exercise their professional judgment to not fill prescriptions they deemed were not appropriate. Walmart admits that its relevant policies were amended in 2017 to expressly allow the use of "blanket refusal" forms; however, even before 2017, Walmart pharmacists were permitted and encouraged to refuse to fill any prescriptions from a particular prescriber they deemed were not appropriate. Walmart further admits that its policies were amended in 2017 to describe procedures for central blocks of prescribers. Walmart denies the remaining allegations in Paragraph 378.

379. Paragraph 379 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 379.

380. Walmart admits that it received a show cause order from DEA on November 13, 2009, relating to a store located in California operated by Walmart and/or one of its subsidiaries. The November 13, 2009 show cause order speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations contained in Paragraph 380.

381. Walmart admits that it entered into a memorandum of agreement with DEA on March 17, 2011. The March 17, 2011 memorandum of agreement speaks for itself and Walmart denies any characterization thereof. Walmart denies the remaining allegations in Paragraph 381.

382. Walmart admits that it entered into a memorandum of agreement with DEA on March 17, 2011. The March 17, 2011 memorandum of agreement speaks for itself and Walmart denies any characterization thereof. Walmart denies the remaining allegations in Paragraph 382.

383. Walmart admits that it entered into a memorandum of agreement with DEA on March 17, 2011. The March 17, 2011 memorandum of agreement speaks for itself and Walmart denies any characterization thereof. Walmart denies the remaining allegations in Paragraph 383.

384. Walmart denies the allegations in Paragraph 384.

385. Paragraph 385 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 385.

386. Paragraph 386 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 386.

387. Paragraph 387 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 387.

388. Paragraph 388 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 388 and further denies the allegations contained therein.

389. Paragraph 389 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 389 and further denies the allegations contained therein.

390. The allegations in Paragraph 390 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 390 is deemed to contain allegations against Walmart, Walmart denies such allegations.

391. The allegations in Paragraph 391 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 391 is deemed to contain allegations against Walmart, Walmart denies such allegations.

392. The allegations in Paragraph 392 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 392 is deemed to contain allegations against Walmart, Walmart denies such allegations.

393. The allegations in Paragraph 393 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 393 is deemed to contain allegations against Walmart, Walmart denies such allegations.

394. The allegations in Paragraph 394 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 394 is deemed to contain allegations against Walmart, Walmart denies such allegations.

395. The allegations in Paragraph 395 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 395 is deemed to contain allegations against Walmart, Walmart denies such allegations.

396. The allegations in Paragraph 396 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 396 is deemed to contain allegations against Walmart, Walmart denies such allegations.

397. The allegations in Paragraph 397 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 397 is deemed to contain allegations against Walmart, Walmart denies such allegations.

398. The allegations in Paragraph 398 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 398 is deemed to contain allegations against Walmart, Walmart denies such allegations.

399. The allegations in Paragraph 399 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 399 is deemed to contain allegations against Walmart, Walmart denies such allegations.

400. The allegations in Paragraph 400 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 400 is deemed to contain allegations against Walmart, Walmart denies such allegations.

401. The allegations in Paragraph 401 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 401 is deemed to contain allegations against Walmart, Walmart denies such allegations.

402. The allegations in Paragraph 402 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 402 is deemed to contain allegations against Walmart, Walmart denies such allegations.

403. The allegations in Paragraph 403 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 403 is deemed to contain allegations against Walmart, Walmart denies such allegations.

404. The allegations in Paragraph 404 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 404 is deemed to contain allegations against Walmart, Walmart denies such allegations.

405. The allegations in Paragraph 405 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 405 is deemed to contain allegations against Walmart, Walmart denies such allegations.

406. The allegations in Paragraph 406 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 406 is deemed to contain allegations against Walmart, Walmart denies such allegations.

407. The allegations in Paragraph 407 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 407 is deemed to contain allegations against Walmart, Walmart denies such allegations.

408. The allegations in Paragraph 408 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 408 is deemed to contain allegations against Walmart, Walmart denies such allegations.

409. The allegations in Paragraph 409 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 409 is deemed to contain allegations against Walmart, Walmart denies such allegations.

410. The allegations in Paragraph 410 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 410 is deemed to contain allegations against Walmart, Walmart denies such allegations.

411. The allegations in Paragraph 411 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 411 is deemed to contain allegations against Walmart, Walmart denies such allegations.

412. The allegations in Paragraph 412 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 412 is deemed to contain allegations against Walmart, Walmart denies such allegations.

413. Walmart denies the allegations in Paragraph 413 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 413, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

414. Paragraph 414 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 414 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 414 is deemed to contain allegations against Walmart, Walmart denies such allegations.

415. The allegations in Paragraph 415 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 415 is deemed to contain allegations against Walmart, Walmart denies such allegations.

416. The allegations in Paragraph 416 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 416 is deemed to contain allegations against Walmart, Walmart denies such allegations.

417. The allegations in Paragraph 417 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 417 is deemed to contain allegations against Walmart, Walmart denies such allegations.

418. The allegations in Paragraph 418 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 418 is deemed to contain allegations against Walmart, Walmart denies such allegations.

419. The allegations in Paragraph 419 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 419 is deemed to contain allegations against Walmart, Walmart denies such allegations.

420. The allegations in Paragraph 420 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 420 is deemed to contain allegations against Walmart, Walmart denies such allegations.

421. The allegations in Paragraph 421 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 421 is deemed to contain allegations against Walmart, Walmart denies such allegations.

422. The allegations in Paragraph 422 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 422 is deemed to contain allegations against Walmart, Walmart denies such allegations.

423. The allegations in Paragraph 423 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 423 is deemed to contain allegations against Walmart, Walmart denies such allegations.

424. The allegations in Paragraph 424 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 424 is deemed to contain allegations against Walmart, Walmart denies such allegations.

425. Paragraph 425 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 425 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 425, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

426. Paragraph 426 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 426 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 426, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

427. Paragraph 427 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 427 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 427, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

428. Paragraph 428 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 428 purports to contain factual allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 428, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

429. Paragraph 429 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 429 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 429, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

430. Paragraph 430 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 430 purports to contain factual allegations of

wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 430, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied..

431. Paragraph 431 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 431 purports to contain factual allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 431, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

432. Paragraph 432 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 432 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 432, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

433. Paragraph 433 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 433 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 433, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

434. Paragraph 434 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 434 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors

HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 434, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

435. Paragraph 435 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 435 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 435, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

436. Walmart denies the allegations in Paragraph 436 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 436, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

437. Paragraph 437 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart admits that NACDS provided support for S. 483, including signing a letter supporting the bill that was sent to Senators Hatch and White. Walmart denies the remaining allegations in Paragraph 437 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 437, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

438. Paragraph 438 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 438 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in

Paragraph 438. Further, to the extent Paragraph 438 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

439. Paragraph 439 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 439 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 439 is deemed to contain allegations against Walmart, Walmart denies such allegations.

440. The allegations in Paragraph 440 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 440 is deemed to contain allegations against Walmart, Walmart denies such allegations.

441. The allegations in Paragraph 441 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 441 is deemed to contain allegations against Walmart, Walmart denies such allegations.

442. Paragraph 442 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 442 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 442, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

443. Paragraph 443 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 443; such allegations are therefore deemed to be denied.

444. Paragraph 444 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 444; such allegations are therefore deemed to be denied.

445. Paragraph 445 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart admits that the NACDS Policy Council has discussed certain legislation relating to regulatory requirements applicable to pharmacists. Walmart denies the remaining allegations in Paragraph 445 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 445, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

446. Paragraph 446 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 446 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 446, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

447. Paragraph 447 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 447 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form

a belief as to the truth of the allegations in Paragraph 447, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

448. Walmart denies the allegations in Paragraph 448 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 448, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

449. The allegations in Paragraph 449 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 449 is deemed to contain allegations against Walmart, Walmart denies such allegations.

450. The allegations in Paragraph 450 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 450 is deemed to contain allegations against Walmart, Walmart denies such allegations.

451. The allegations in Paragraph 451 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 451 is deemed to contain allegations against Walmart, Walmart denies such allegations.

452. Paragraph 452 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart admits that McKesson and Walmart formed ClarusOne

Sourcing Service LLP in May 2016 to source generic pharmaceuticals to members of the organization, including Walmart and McKesson. Walmart denies the remaining allegations in Paragraph 452.

453. Walmart denies the allegations in Paragraph 453 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 453, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

454. Walmart denies the allegations in Paragraph 454 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 454, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

455. The allegations in Paragraph 455 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 455 is deemed to contain allegations against Walmart, Walmart denies such allegations.

456. The allegations in Paragraph 456 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 456 is deemed to contain allegations against Walmart, Walmart denies such allegations.

457. The allegations in Paragraph 457 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without

knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 457 is deemed to contain allegations against Walmart, Walmart denies such allegations.

458. The allegations in Paragraph 458 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 458 is deemed to contain allegations against Walmart, Walmart denies such allegations.

459. The allegations in Paragraph 459 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 459 is deemed to contain allegations against Walmart, Walmart denies such allegations.

460. The allegations in Paragraph 460 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 460 is deemed to contain allegations against Walmart, Walmart denies such allegations.

461. The allegations in Paragraph 461 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 461 is deemed to contain allegations against Walmart, Walmart denies such allegations.

462. The allegations in Paragraph 462 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 462 is deemed to contain allegations against Walmart, Walmart denies such allegations.

463. The allegations in Paragraph 463 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 463 is deemed to contain allegations against Walmart, Walmart denies such allegations.

464. The allegations in Paragraph 464 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 464 is deemed to contain allegations against Walmart, Walmart denies such allegations.

465. The allegations in Paragraph 465 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 465 is deemed to contain allegations against Walmart, Walmart denies such allegations.

466. The allegations in Paragraph 466 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 466 is deemed to contain allegations against Walmart, Walmart denies such allegations.

467. The allegations in Paragraph 467 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 467 is deemed to contain allegations against Walmart, Walmart denies such allegations.

468. The allegations in Paragraph 468 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 468 is deemed to contain allegations against Walmart, Walmart denies such allegations.

469. The allegations in Paragraph 469 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 469 is deemed to contain allegations against Walmart, Walmart denies such allegations.

470. The allegations in Paragraph 470 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 470 is deemed to contain allegations against Walmart, Walmart denies such allegations.

471. The allegations in Paragraph 471 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 471 is deemed to contain allegations against Walmart, Walmart denies such allegations.

472. The allegations in Paragraph 472 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 472 is deemed to contain allegations against Walmart, Walmart denies such allegations.

473. The allegations in Paragraph 473 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 473 is deemed to contain allegations against Walmart, Walmart denies such allegations.

474. The allegations in Paragraph 474 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 474 is deemed to contain allegations against Walmart, Walmart denies such allegations.

475. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 475; such allegations are therefore deemed to be denied.

476. The allegations in Paragraph 476 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 476 is deemed to contain allegations against Walmart, Walmart denies such allegations.

477. The allegations in Paragraph 477 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 477 is deemed to contain allegations against Walmart, Walmart denies such allegations.

478. The allegations in Paragraph 478 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 478 is deemed to contain allegations against Walmart, Walmart denies such allegations.

479. Walmart denies the allegations in Paragraph 479 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 479, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

480. Walmart has expressed its commitment to taking an active role in the fight against our nation's opioid issue. Walmart denies the remaining allegations in Paragraph 480 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form

a belief as to the truth of the allegations in Paragraph 480, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

481. The allegations in Paragraph 481 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 481 is deemed to contain allegations against Walmart, Walmart denies such allegations.

482. The allegations in Paragraph 482 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 482 is deemed to contain allegations against Walmart, Walmart denies such allegations.

483. The allegations in Paragraph 483 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 483 is deemed to contain allegations against Walmart, Walmart denies such allegations.

484. The allegations in Paragraph 484 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 484 is deemed to contain allegations against Walmart, Walmart denies such allegations.

485. The allegations in Paragraph 485 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 485 is deemed to contain allegations against Walmart, Walmart denies such allegations.

486. The allegations in Paragraph 486 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 486 is deemed to contain allegations against Walmart, Walmart denies such allegations.

487. The allegations in Paragraph 487 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 487 is deemed to contain allegations against Walmart, Walmart denies such allegations.

488. The allegations in Paragraph 488 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 488 is deemed to contain allegations against Walmart, Walmart denies such allegations.

489. Paragraph 489 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 489.

490. Paragraph 490 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 490.

491. The allegations in Paragraph 491 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 491 is deemed to contain allegations against Walmart, Walmart denies such allegations.

492. The allegations in Paragraph 492 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 492 is deemed to contain allegations against Walmart, Walmart denies such allegations.

251. This paragraph, incorrectly numbered as Paragraph 251, refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in this paragraph to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

493. Paragraph 493 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 493 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 493, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

494. Paragraph 494 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 494 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 494, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

495. Walmart denies the allegations in Paragraph 495 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 495, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

496. The allegations in Paragraph 496 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 496 is deemed to contain allegations against Walmart, Walmart denies such allegations.

497. The allegations in Paragraph 497 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 497 is deemed to contain allegations against Walmart, Walmart denies such allegations.

498. The allegations in Paragraph 498 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 498 is deemed to contain allegations against Walmart, Walmart denies such allegations.

499. The allegations in Paragraph 499 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 499 is deemed to contain allegations against Walmart, Walmart denies such allegations.

500. The allegations in Paragraph 500 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 500 is deemed to contain allegations against Walmart, Walmart denies such allegations.

501. The allegations in Paragraph 501 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 501 is deemed to contain allegations against Walmart, Walmart denies such allegations.

502. The allegations in Paragraph 502 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 502 is deemed to contain allegations against Walmart, Walmart denies such allegations.

503. The allegations in Paragraph 503 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 503 is deemed to contain allegations against Walmart, Walmart denies such allegations.

504. The allegations in Paragraph 504 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 504 is deemed to contain allegations against Walmart, Walmart denies such allegations.

505. The allegations in Paragraph 505 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 505 is deemed to contain allegations against Walmart, Walmart denies such allegations.

506. The allegations in Paragraph 506 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 506 is deemed to contain allegations against Walmart, Walmart denies such allegations.

507. The allegations in Paragraph 507 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 507 is deemed to contain allegations against Walmart, Walmart denies such allegations.

508. The allegations in Paragraph 508 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 508 is deemed to contain allegations against Walmart, Walmart denies such allegations.

509. The allegations in Paragraph 509 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 509 is deemed to contain allegations against Walmart, Walmart denies such allegations.

510. The allegations in Paragraph 510 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 510 is deemed to contain allegations against Walmart, Walmart denies such allegations.

511. The allegations in Paragraph 511 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 511 is deemed to contain allegations against Walmart, Walmart denies such allegations.

512. The allegations in Paragraph 512 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 512 is deemed to contain allegations against Walmart, Walmart denies such allegations.

513. The allegations in Paragraph 513 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 513 is deemed to contain allegations against Walmart, Walmart denies such allegations.

514. The allegations in Paragraph 514 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 514 is deemed to contain allegations against Walmart, Walmart denies such allegations.

515. The allegations in Paragraph 515 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 515 is deemed to contain allegations against Walmart, Walmart denies such allegations.

516. The allegations in Paragraph 516 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 516 is deemed to contain allegations against Walmart, Walmart denies such allegations.

517. The allegations in Paragraph 517 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 517 is deemed to contain allegations against Walmart, Walmart denies such allegations.

518. The allegations in Paragraph 518 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 518 is deemed to contain allegations against Walmart, Walmart denies such allegations.

519. The allegations in Paragraph 519 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 519 is deemed to contain allegations against Walmart, Walmart denies such allegations.

520. The allegations in Paragraph 520 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 520 is deemed to contain allegations against Walmart, Walmart denies such allegations.

521. The allegations in Paragraph 521 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 521 is deemed to contain allegations against Walmart, Walmart denies such allegations.

522. The allegations in Paragraph 522 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 522 is deemed to contain allegations against Walmart, Walmart denies such allegations.

523. The allegations in Paragraph 523 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 523 is deemed to contain allegations against Walmart, Walmart denies such allegations.

524. The allegations in Paragraph 524 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 524 is deemed to contain allegations against Walmart, Walmart denies such allegations.

525. The allegations in Paragraph 525 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 525 is deemed to contain allegations against Walmart, Walmart denies such allegations.

526. The allegations in Paragraph 526 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 526 is deemed to contain allegations against Walmart, Walmart denies such allegations.

527. The allegations in Paragraph 527 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 527 is deemed to contain allegations against Walmart, Walmart denies such allegations.

528. The allegations in Paragraph 528 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 528 is deemed to contain allegations against Walmart, Walmart denies such allegations.

529. The allegations in Paragraph 529 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 529 is deemed to contain allegations against Walmart, Walmart denies such allegations.

530. The allegations in Paragraph 530 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 530 is deemed to contain allegations against Walmart, Walmart denies such allegations.

531. The allegations in Paragraph 531 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 531 is deemed to contain allegations against Walmart, Walmart denies such allegations.

532. The allegations in Paragraph 532 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 532 is deemed to contain allegations against Walmart, Walmart denies such allegations.

533. The allegations in Paragraph 533 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 533 is deemed to contain allegations against Walmart, Walmart denies such allegations.

534. The allegations in Paragraph 534 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 534 is deemed to contain allegations against Walmart, Walmart denies such allegations.

535. Paragraph 535 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 535.

536. Paragraph 536 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 536.

537. Paragraph 537 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 537.

538. Walmart denies the allegations in Paragraph 538 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 538, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

539. Walmart denies the allegations in Paragraph 539 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 539, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

540. Paragraph 540 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 540 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 540, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

541. Paragraph 541 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 541 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 541, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

542. Paragraph 542 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 542 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 542, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

543. Paragraph 543 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 543 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 543, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

544. Paragraph 544 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 544 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is

otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 544, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

545. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 545; such allegations are therefore deemed to be denied.

546. Walmart admits certain prescriptions written in one state may, under some circumstances, be filled in a different state. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 546, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

547. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 547; such allegations are therefore deemed to be denied.

548. Paragraph 548 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 548; such allegations are therefore deemed to be denied.

549. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 549; such allegations are therefore deemed to be denied.

550. Paragraph 550 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to

form a belief as to the truth of the allegations in Paragraph 550; such allegations are therefore deemed to be denied.

551. Paragraph 551 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 551; such allegations are therefore deemed to be denied.

552. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 552; such allegations are therefore deemed to be denied.

553. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 553; such allegations are therefore deemed to be denied.

554. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 554; such allegations are therefore deemed to be denied.

555. Walmart denies the allegations in Paragraph 555 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 555, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

556. Paragraph 556 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 556 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in

Paragraph 556. Further, to the extent Paragraph 556 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

557. Paragraph 557 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 557 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 557. Further, to the extent Paragraph 557 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

558. Paragraph 558 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 558 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 558. Further, to the extent Paragraph 558 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

559. Paragraph 559 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 559 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 559. Further, to the extent Paragraph 559 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

560. Paragraph 560 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 560 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

561. Paragraph 561 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 561 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in

Paragraph 561. Further, to the extent Paragraph 561 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

562. Paragraph 562 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 562 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 562. Further, to the extent Paragraph 562 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

563. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 563; such allegations are therefore deemed to be denied.

564. Paragraph 564 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 564; such allegations are therefore deemed to be denied.

565. Paragraph 565 purports to compile governmentally-disclosed ARCOS data which speaks for itself, and Walmart denies any characterization thereof. To the extent Paragraph 565 purports to contain factual allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 565, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

566. Paragraph 566 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 566.

Further, to the extent Paragraph 566 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

567. Paragraph 567 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 567. Further, to the extent Paragraph 567 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

568. Paragraph 568 purports to compile governmentally-disclosed ARCOS data which speaks for itself, and Walmart denies any characterization thereof. To the extent Paragraph 568 purports to contain factual allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 568, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

569. The allegations in Paragraph 569 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 569 is deemed to contain allegations against Walmart, Walmart denies such allegations.

570. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 570; such allegations are therefore deemed to be denied.

571. Paragraph 571 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 571 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in

Paragraph 571 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 571, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

572. Paragraph 572 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 572 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 572, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

573. Paragraph 573 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. While Walmart is aware of reports regarding drug overdose, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 573; such allegations are therefore deemed to be denied.

574. Paragraph 574 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 574; such allegations are therefore deemed to be denied.

575. Paragraph 575 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 575; such allegations are therefore deemed to be denied.

576. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 576; such allegations are therefore deemed to be denied.

577. Paragraph 577 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 577; such allegations are therefore deemed to be denied.

578. Paragraph 578 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 578; such allegations are therefore deemed to be denied.

579. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 579; such allegations are therefore deemed to be denied.

580. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 580; such allegations are therefore deemed to be denied.

581. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 581; such allegations are therefore deemed to be denied.

582. Paragraph 582 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to

form a belief as to the truth of the allegations in Paragraph 582; such allegations are therefore deemed to be denied.

583. Paragraph 583 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 583; such allegations are therefore deemed to be denied.

584. Paragraph 584 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 584; such allegations are therefore deemed to be denied.

585. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 585; such allegations are therefore deemed to be denied.

586. Walmart acknowledges that abuse of and addiction to opioids is a serious public health issue. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 586; such allegations are therefore deemed to be denied.

587. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 587; such allegations are therefore deemed to be denied.

588. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 588; such allegations are therefore deemed to be denied.

589. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 589; such allegations are therefore deemed to be denied.

590. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 590; such allegations are therefore deemed to be denied.

591. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 591; such allegations are therefore deemed to be denied.

592. Walmart acknowledges that abuse of and addiction to opioids is a serious public health issue. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 592; such allegations are therefore deemed to be denied.

593. Paragraph 593 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 593; such allegations are therefore deemed to be denied.

594. Paragraph 594 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 594; such allegations are therefore deemed to be denied.

595. Paragraph 595 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to

form a belief as to the truth of the allegations in Paragraph 595; such allegations are therefore deemed to be denied.

596. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 596; such allegations are therefore deemed to be denied.

597. Paragraph 597 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 597; such allegations are therefore deemed to be denied.

598. Paragraph 598 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 598; such allegations are therefore deemed to be denied.

599. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 599; such allegations are therefore deemed to be denied.

600. Walmart denies the allegations in Paragraph 600 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 600, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

601. Walmart denies the allegations in Paragraph 601 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to

the truth of the allegations in Paragraph 601, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

602. Walmart denies the allegations in Paragraph 602 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 602, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

603. Walmart denies the allegations in Paragraph 603 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 603, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

604. Walmart denies the allegations in Paragraph 604 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 604, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

605. Walmart denies the allegations in Paragraph 605 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 605, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

606. Walmart denies the allegations in Paragraph 606 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to

the truth of the allegations in Paragraph 606, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

607. Paragraph 607 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 607 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 607, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

608. Paragraph 608 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 608 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 608, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

609. Paragraph 609 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 609 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 609, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

610. Paragraph 610 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 610 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is

otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 610, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

611. Paragraph 611 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 611 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 611, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

612. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 612; such allegations are therefore deemed to be denied.

613. Paragraph 613 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 613 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 613, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

614. Paragraph 614 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 614 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 614, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

615. Paragraph 615 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 615 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 615, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

616. Walmart incorporates by reference its answers to all other allegations contained in this Answer as if fully set forth herein.

617. Paragraph 617 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 617 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 617, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

618. Paragraph 618 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 618 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

619. Paragraph 619 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 619 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 619, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

620. Paragraph 620 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 620 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 620, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

621. Paragraph 621 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 621 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 621, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

622. Paragraph 622 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 622 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 622, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

623. Paragraph 623 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 623 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 623, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

624. Paragraph 624 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 624 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 624, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

625. Paragraph 625 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 625 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 625, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

626. Paragraph 626 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 626 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 626, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

627. Paragraph 627 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 627 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is

otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 627, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

628. Paragraph 628 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 628 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 628. Further, to the extent Paragraph 628 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

629. Paragraph 629 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 629 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 629, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

630. Paragraph 630 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 630 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 630, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

631. Paragraph 631 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 631 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is

otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 631, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

632. Paragraph 632 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 632 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 632. Further, to the extent Paragraph 632 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

633. Paragraph 633 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 633 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 633. Further, to the extent Paragraph 633 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

634. Paragraph 634 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 634 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 634, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

635. Walmart denies the allegations in Paragraph 635 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 635, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

636. Paragraph 636 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 636 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 636, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

637. Walmart denies the allegations in Paragraph 637 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 637, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

638. Paragraph 638 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 638 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 638, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

639. Paragraph 639 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 639 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 639, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

640. Paragraph 640 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 640 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 640, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

641. Paragraph 641 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 641 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 641, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

642. Paragraph 642 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 642 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 642, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

643. Paragraph 643 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 643 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 643, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

644. Paragraph 644 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 644 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 644, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

645. Paragraph 645 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 645 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 645, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

646. Paragraph 646 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 646 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 646, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

647. Paragraph 647 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 647 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is

otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 647, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

648. Paragraph 648 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 648 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 648, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

649. Paragraph 649 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 649 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 649, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

650. Paragraph 650 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 650 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 650, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

651. Paragraph 651 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 651 and

further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 651, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

652. Paragraph 652 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 652 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 652, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

653. Paragraph 653 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 653 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 653, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

654. Paragraph 654 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 654 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 654, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

607. Walmart denies that Plaintiff is entitled the relief described in this paragraph, which is incorrectly numbered as Paragraph 607.

AFFIRMATIVE AND OTHER DEFENSES

Having answered the allegations of Plaintiff's Complaint, and having denied any liability whatsoever, Walmart further denies any allegations that have not been expressly admitted and sets forth below its defenses. By setting forth these defenses, Walmart does not assume the burden of proving any fact, issue, or element of a cause of action where such burden properly belongs to Plaintiff. Moreover, Walmart does not intend these defenses to be, nor shall they be construed as, an acknowledgement that any particular issue or subject matter is relevant to Plaintiff's allegations. Walmart does not admit or acknowledge that it bears the burden of proof or burden of persuasion with respect to any such defense. Upon completion of discovery, if the facts warrant, Walmart may withdraw any of these defenses as may be appropriate. Walmart reserves the right to (i) rely on any other applicable defenses set forth in any Answer or listing of affirmative defenses of any other Walmart in this Action, (ii) rely on any other defenses that may become apparent during fact or expert discovery in this matter, and (iii) to amend its Answer to assert any such defenses.

FIRST DEFENSE

The Complaint fails to state facts sufficient to constitute a claim upon which relief may be granted against Walmart.

SECOND DEFENSE

Plaintiff's claims are barred by the applicable statutes of limitations.

THIRD DEFENSE

Plaintiff's claims are barred by the applicable statute of repose.

FOURTH DEFENSE

Plaintiff's claims are barred by the doctrine of laches.

FIFTH DEFENSE

Plaintiff's claims are barred or limited for lack of standing.

SIXTH DEFENSE

Plaintiff's claims are barred by the voluntary payment doctrine.

SEVENTH DEFENSE

Plaintiff's claims are barred, in whole or in part, because Plaintiff lack capacity to bring their claims, including claims indirectly maintained on behalf of their citizens and claims brought as *parens patriae*.

EIGHTH DEFENSE

Plaintiff's claims are barred because Plaintiff is not the real parties in interest.

NINTH DEFENSE

Plaintiff's claims are not ripe and/or have been mooted.

TENTH DEFENSE

Plaintiff's claims and damages are barred or limited, in whole or in part, by common law, statutory, and state constitutional constraints on the exercise of police powers by a municipality.

ELEVENTH DEFENSE

Plaintiff's claims and damages are barred or limited by the political question and separation of powers doctrines and because their claims implicate issues of statewide importance that are reserved for state regulation.

TWELFTH DEFENSE

Plaintiff's claims are barred by the doctrine of unclean hands.

THIRTEENTH DEFENSE

Plaintiff's claims are barred by the doctrine of *in pari delicto*.

FOURTEENTH DEFENSE

Plaintiff's claims are barred, in whole or in part, for failure to exhaust administrative remedies or to satisfy other procedural prerequisites.

FIFTEENTH DEFENSE

Plaintiff's claims are barred by the doctrines of estoppel, waiver, and/or ratification.

SIXTEENTH DEFENSE

Plaintiff's claims are barred by the doctrines of res judicata and collateral estoppel.

SEVENTEENTH DEFENSE

Venue may be improper and/or inconvenient in this Court.

EIGHTEENTH DEFENSE

Plaintiff's claims are barred or limited by the terms and effect of any applicable consent judgment or settlement, including by operation of the doctrines of res judicata and collateral estoppel, failure to fulfill conditions precedent, failure to provide requisite notice, payment, accord and satisfaction, and compromise and settlement.

NINETEENTH DEFENSE

Plaintiff has failed to join all necessary parties, including without limitation health care providers, prescribers, patients, and other third parties whom Plaintiff allege engaged in the unauthorized or illicit prescription, dispensing, diversion, or use of prescription opioid products.

TWENTIETH DEFENSE

Plaintiff's claims against Walmart do not arise out of the same transactions or occurrences as their claims against other defendants, as required for joinder of parties.

TWENTY-FIRST DEFENSE

Plaintiff's claims are barred to the extent they relate to Walmart's alleged lobbying or other activities protected by the First Amendment to the Constitution of the United States or by the Constitution of the State of Ohio or that of any other state whose laws may apply.

TWENTY-SECOND DEFENSE

Plaintiff's claims are barred, in whole or in part, to the extent that they violate the Due Process or Ex Post Facto clauses of the United States or Ohio constitutions.

TWENTY-THIRD DEFENSE

Walmart's rights under the Due Process Clause of the U.S. Constitution and applicable state Constitution or statute are violated by any financial or other arrangement that might distort a government attorney's duty to pursue justice rather than his or her personal interests, financial or otherwise, in the context of a civil enforcement proceeding, including by Plaintiff's use of a contingency fee contract with private counsel.

TWENTY-FOURTH DEFENSE

Plaintiff's claims are barred, in whole or in part, to the extent that they violate the Dormant Commerce Clause of the United States Constitution.

TWENTY-FIFTH DEFENSE

Walmart denies all types of causation, including without limitation, cause in fact, proximate cause and producing cause, with respect to the claims asserted against Walmart.

TWENTY-SIXTH DEFENSE

Plaintiff's claims are barred, in whole or in part, because Walmart did not proximately cause the damages complained of, and because the acts of other persons (including individuals engaged in the illegal distribution or use of opioids without a proper prescription) intervened between Walmart's acts and Plaintiff's harms. Walmart had no legal duty to protect Plaintiff from

the intentional criminal acts of third persons, which are superseding causes that extinguish any liability.

TWENTY-SEVENTH DEFENSE

The injuries and damages claimed by Plaintiff resulted from an intervening or superseding cause and/or causes, and any act or omission on the part of Walmart was not the proximate and/or competent producing cause of such alleged injuries and damages.

TWENTY-EIGHTH DEFENSE

Plaintiff's injuries and damages, if any, were due to misuse, illicit use, or abuse of the medications at issue on the part of the medication users, for which Walmart is not liable.

TWENTY-NINTH DEFENSE

Any injuries and/or damages sustained by Plaintiff may have been caused or contributed to by the negligence or actual conduct of Plaintiff and/or other persons, firms, corporations, or entities over whom Walmart had no control or right of control and for whom it is not responsible.

THIRTIETH DEFENSE

Plaintiff's claims are barred, in whole or in part, because their alleged injuries or damages were caused by unforeseeable and uncontrollable forces over which Walmart had no control and for which Walmart is not responsible, including without limitation pre-existing or unrelated medical conditions.

THIRTY-FIRST DEFENSE

Plaintiff's claims are barred, in whole or in part, because any and all damages alleged by Plaintiff were caused by misuse of the products involved, failure to use the products properly, and/or alteration or modification of, or criminal misuse or abuse of, the prescribed medications by third parties over whom Walmart had no control, for whom Walmart are not responsible, and that operated as superseding causes that extinguish any liability.

THIRTY-SECOND DEFENSE

Plaintiff would be unjustly enriched if allowed to recover on any of their claims.

THIRTY-THIRD DEFENSE

Plaintiff's claims are barred in whole or in part because Plaintiff suffered no injuries or damages as a result of any action by Walmart.

THIRTY-FOURTH DEFENSE

Plaintiff's claims are barred, in whole or in part, because the derivative injury rule and the remoteness doctrine bar Plaintiff from recovering payments that they allegedly made on behalf their residents to reimburse any expenses for health care, pharmaceutical care, and/or other public services.

THIRTY-FIFTH DEFENSE

Plaintiff's claims are barred to the extent that Walmart has valid defenses that bar recovery by those persons on whose behalf Plaintiff purportedly seek recovery.

THIRTY-SIXTH DEFENSE

Plaintiff's claims are subject to all defenses that could be asserted if Plaintiff's claims were properly made by individuals on whose behalf or for whose alleged damages Plaintiff seek to recover.

THIRTY-SEVENTH DEFENSE

Plaintiff has failed to comply with the requirement that they identify each patient in whose claim(s) they have a subrogation interest and on whose behalf they have incurred costs.

THIRTY-EIGHTH DEFENSE

Plaintiff fails to plead that they reimbursed any prescriptions for any opioid distributed by Walmart that harmed patients and should not have been prescribed or distributed, that Walmart

caused any health care provider to write any ineffective or harmful opioid prescriptions, or that any specific prescription was unauthorized, medically unnecessary, ineffective, or harmful.

THIRTY-NINTH DEFENSE

Plaintiff's claims are barred to the extent that Plaintiff's alleged damages are speculative, uncertain, and hypothetical.

FORTIETH DEFENSE

Any recovery by Plaintiff may be barred, in whole or in part, by the principle of comparative or contributory fault.

FORTY-FIRST DEFENSE

Any recovery against Walmart is barred or limited under the principles of assumption of the risk and informed consent.

FORTY-SECOND DEFENSE

Plaintiff's damages, if any, were caused by the active, direct, and proximate negligence or actual conduct of entities or persons other than Walmart, and in the event that Walmart is found to be liable to Plaintiff, Walmart will be entitled to indemnification, contribution, and/or apportionment.

FORTY-THIRD DEFENSE

Walmart asserts its right to a proportionate reduction of any damages found against Walmart based on the negligence or other conduct of any settling tortfeasor and/or responsible third party and/or Plaintiff.

FORTY-FOURTH DEFENSE

A specific percentage of the tortious conduct that proximately caused the injury or loss to person or property is attributable to (i) each Plaintiff, (ii) other parties from whom Plaintiff seeks recovery, and (iii) persons from whom Plaintiff does not seek recovery in this action, including,

but not limited to, prescribing practitioners, non-party pharmacies and pharmacists, individuals and entities involved in diversion and distribution of prescription opioids, individuals and entities involved in import, distribution, and sale of illegal opioids, individuals involved in procuring diverted prescription opioids and/or illegal drugs, delivery services, federal, state, and local government entities, and health insurers and pharmacy benefit managers. Ohio Revised Code § 2307.23.

FORTY-FIFTH DEFENSE

Any verdict or judgment that might be recovered by Plaintiff must be reduced by those amounts that have already indemnified or with reasonable certainty will indemnify Plaintiff in whole or in part for any past or future claimed economic loss from any collateral source or any other applicable law.

FORTY-SIXTH DEFENSE

If Walmart is found liable for Plaintiff's alleged injuries and losses (which liability is specifically denied), the facts will show that Walmart caused fifty percent or less of the conduct that proximately caused such injuries or loss and is liable only for its proportionate share of the damages that represent economic loss. *See* Ohio Revised Code §§ 2307.22-.23. Any recovery by Plaintiff must be reduced pursuant to Ohio Rev. Code §§ 2315.32-35 and 2307.23 to account for the acts or omissions attributable to Plaintiff.

FORTY-SEVENTH DEFENSE

The damages which Plaintiff may be entitled to recover if liability is established (which liability is specifically denied) are capped pursuant to Ohio Revised Code §§ 2315.18 and 2315.21.

FORTY-EIGHTH DEFENSE

Any damages that Plaintiff may recover against Walmart must be reduced to the extent that Plaintiff is seeking damages for alleged injuries or expenses related to the same user(s) of the

subject drugs, or damages recovered or recoverable by other actual or potential Plaintiff. Any damages that Plaintiff may recover against Walmart must be reduced to the extent they unjustly enrich Plaintiff.

FORTY-NINTH DEFENSE

Plaintiff's claims against Walmart are barred to the extent they rely, explicitly or implicitly, on a theory of market-share liability.

FIFTIETH DEFENSE

Plaintiff's claims against Walmart are barred or limited by the economic loss rule.

FIFTY-FIRST DEFENSE

Plaintiff is barred, in whole or in part, from recovering costs incurred in providing public services by the free public services and/or municipal cost recovery doctrine.

FIFTY-SECOND DEFENSE

Plaintiff may have failed or refused to exercise reasonable care and diligence to avoid loss and minimize damages and, therefore, may not recover for losses that could have been prevented by reasonable efforts on its part, or by expenditures which might reasonably have been made. Recovery, if any, should therefore be reduced by Plaintiff's failure to mitigate damages, if any.

FIFTY-THIRD DEFENSE

To the extent Plaintiff attempts to seek equitable relief, Plaintiff is not entitled to such relief because Plaintiff has an adequate remedy at law.

FIFTY-FOURTH DEFENSE

Plaintiff's claims are barred, in whole or in part, because federal agencies have exclusive or primary jurisdiction over the matters asserted in the Complaint.

FIFTY-FIFTH DEFENSE

Plaintiff's claims are preempted by federal law, including (without limitation) the federal Controlled Substances Act and the Food, Drug, and Cosmetic Act ("FDCA").

FIFTY-SIXTH DEFENSE

The conduct of Walmart conformed with the FDCA and the requirements of the Food and Drug Administration ("FDA"), and the activities of Walmart alleged in the Complaint conformed with all state and federal statutes, regulations, and industry standards based on the state of knowledge at the relevant time(s) alleged in the Complaint.

FIFTY-SEVENTH DEFENSE

Plaintiff's claims are barred, in whole or in part, by conflict preemption as set forth in the United States Supreme Court's decisions in *PLIVA, Inc. v. Mensing*, 131 S. Ct. 2567 (2011), and *Mutual Pharm. Co. v. Bartlett*, 133 S. Ct. 2466 (2013).

FIFTY-EIGHTH DEFENSE

Plaintiff's claims are preempted insofar as they conflict with Congress's purposes and objectives in enacting relevant federal legislation and authorizing regulations, including the Hatch-Waxman Amendments to the FDCA and implementing regulations. *See Geier v. Am. Honda Co.*, 529 U.S. 861 (2000).

FIFTY-NINTH DEFENSE

To the extent Plaintiff asserts claims that depend solely on violations of federal law, including any claims of a "fraud on the FDA" with respect to the Manufacturer Defendants' disclosure of information related to the safety of their medications at issue, such claims are barred and should be dismissed. *See Buckman v. Plaintiff's Legal Comm'n*, 531 U.S. 341 (2001).

SIXTIETH DEFENSE

To the extent Plaintiff asserts claims that depend solely on violations of federal law, including any claims of “fraud on the Drug Enforcement Administration” (“DEA”) with respect to Walmart’s compliance with statutes or regulations administered and/or enforced by the DEA, such claims are barred and should be dismissed. *See Buckman v. Plaintiff’s Legal Comm’n*, 531 U.S. 341 (2001).

SIXTY-FIRST DEFENSE

Plaintiff’s claims are barred, in whole or in part, by the deference that common law accords discretionary actions by the FDA under the FDCA and discretionary actions by the DEA under the Controlled Substances Act.

SIXTY-SECOND DEFENSE

If Plaintiff incurred the damages alleged, which is expressly denied, Walmart is not liable for damages because the methods, standards, or techniques of designing, manufacturing, labeling, and distributing the prescription medications at issue complied with and were in conformity with the laws and regulations of the Controlled Substances Act, the FDCA, and the generally recognized state of the art in the industry at the time the product was designed, manufactured, labeled, and distributed.

SIXTY-THIRD DEFENSE

Plaintiff’s claims are barred to the extent they are based on any allegations involving failure to provide adequate warnings or information because all warnings or information that accompanied the allegedly distributed products were approved by the United States Food & Drug Administration for a product approved under the Federal Food, Drug, and Cosmetic Act (21 U.S.C. Section 301 et seq.), as amended, or Section 351, Public Health Service Act (42 U.S.C. Section 262), as amended, or the warnings and information provided were those stated in monographs

developed by the United States Food & Drug Administration for pharmaceutical products that may be distributed without an approved new drug application.

SIXTY-FOURTH DEFENSE

Plaintiff's claims are barred in whole or in part by the learned intermediary doctrine.

SIXTY-FIFTH DEFENSE

Walmart did not owe or breach any statutory or common law duty to Plaintiff.

SIXTY-SIXTH DEFENSE

Walmart appropriately, completely, and fully performed and discharged any and all obligations and legal duties arising out of the matters alleged in the Complaint.

SIXTY-SEVENTH DEFENSE

Plaintiff's claims are barred, in whole or in part, because Walmart complied at all relevant times with all applicable laws, including all legal and regulatory duties.

SIXTY-EIGHTH DEFENSE

To the extent that Plaintiff relies on letters or other informal guidance from the DEA to establish Walmart's regulatory duties, such informal guidance cannot enlarge Walmart's regulatory duties in the absence of compliance by DEA with the requirements by the Administrative Procedure Act, 5 U.S.C. § 551 *et seq.*

SIXTY-NINTH DEFENSE

Plaintiff's claims are barred to the extent they are based on alleged violations of industry customs because purported industry customs do not create legal duties on Walmart.

SEVENTIETH DEFENSE

The claims asserted in the Complaint are barred, in whole or in part, by the Restatement (Second) of Torts § 402A, Comments j and k, and Restatement (Third) of Torts: Products Liability § 6.

SEVENTY-FIRST DEFENSE

To the extent that Plaintiff is alleging fraud, fraudulent concealment, or similar conduct, Plaintiff has failed to plead fraud with sufficient particularity.

SEVENTY-SECOND DEFENSE

Plaintiff fails to plead any actionable misrepresentation or omission made by or attributable to Walmart.

SEVENTY-THIRD DEFENSE

Plaintiff's claims are barred in whole or in part because no conduct of Walmart was misleading, unfair, or deceptive.

SEVENTY-FOURTH DEFENSE

Plaintiff's claims may be barred, in whole or in part, because neither the users nor their prescribers of the medications distributed by Walmart, nor Plaintiff itself, relied to their detriment upon any statement by Walmart in determining to use the medications at issue.

SEVENTY-FIFTH DEFENSE

Walmart is not liable for any statements in the Manufacturer Defendants' branded or unbranded materials.

SEVENTY-SIXTH DEFENSE

Plaintiff's nuisance claims are barred to the extent that they lack the statutory authority to bring a nuisance claim under Ohio law or their own applicable county or municipal codes or regulations.

SEVENTY-SEVENTIETH DEFENSE

Plaintiff's common law and statutory public nuisance claims are barred or limited to the extent that they have been abrogated or otherwise curtailed by the Ohio Products Liability Act, Ohio Rev. Code § 2307.71, *et seq.*

SEVENTY-EIGHTH DEFENSE

Plaintiff's claim of public nuisance is barred or limited because no action of Walmart involved interference with real property; illegal conduct perpetrated by third parties involving the use of an otherwise legal product does not involve a public right against the distributor sufficient to state a claim for public nuisance; the alleged public nuisance would have impermissible extraterritorial reach; and the alleged conduct of Walmart is too remote from the alleged injury as a matter of law and due process.

SEVENTY-NINTH DEFENSE

Plaintiff's claim for unjust enrichment is barred or limited because Walmart did not receive and retain any alleged benefit from Plaintiff.

EIGHTIETH DEFENSE

Plaintiff's claims are barred, reduced, and/or limited pursuant to the applicable Ohio statutory and common law regarding limitations of awards, caps on recovery, and setoffs.

EIGHTY-FIRST DEFENSE

Plaintiff's claims are barred, reduced, and/or limited to the extent that Walmart is entitled to a credit or setoff for any and all sums Plaintiff has received in the way of any and all settlements.

EIGHTY-SECOND DEFENSES

Plaintiff's Complaint is barred, in whole or in part, by the doctrines of acquiescence, settlement, or release.

EIGHTY-THIRD DEFENSE

Walmart's liability, if any, will not result from their conduct but is solely the result of an obligation imposed by law, and thus Walmart is entitled to complete indemnity, express or implied, by other parties.

EIGHTY-FOURTH DEFENSE

Plaintiff's claims for punitive or exemplary damages or other civil penalties are barred or reduced by applicable law or statute or, in the alternative, are unconstitutional insofar as they violate the Due Process Clauses of the United States Constitution, the Excessive Fines Clause of the Eighth Amendment of the United States Constitution, the Full Faith and Credit Clause of the United States Constitution, the Double Jeopardy Clause of the Fifth Amendment to the United States Constitution, the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution, the Sixth Amendment to the United States Constitution, and applicable provisions of the Constitution of Ohio or that of any other state whose laws may apply. Any law, statute or other authority purporting to permit the recovery of punitive damages or civil penalties in this case is unconstitutional, facially and as applied, to the extent that, without limitation, it:

- (1) lacks constitutionally sufficient standards to guide and restrain the jury's discretion in determining whether to award punitive damages or civil penalties and/or the amount, if any;
- (2) is void for vagueness in that it fails to provide adequate advance notice as to what conduct will result in punitive damages or civil penalties;
- (3) unconstitutionally may permit recovery of punitive damages or civil penalties based on harms to third parties, out-of-state conduct, conduct that complied with applicable law, or conduct that was not directed, or did not proximately cause harm, to Plaintiff;
- (4) permits the imposition of punitive damages where the burden of proof is less than clear and convincing evidence;
- (5) permits the imposition of punitive damages without bifurcating the trial and trying all punitive damages issues separately, only if and after a finding on the merits of the liability of the Walmart;

- (6) permits the imposition of punitive damages without any predetermined limit on any such award;
- (7) permits an imposition of punitive damages that allows for multiple punishments for the same alleged act(s) or omission(s);
- (8) unconstitutionally may permit recovery of punitive damages or civil penalties in an amount that is not both reasonable and proportionate to the amount of harm, if any, to Plaintiff and to the amount of compensatory damages, if any;
- (9) unconstitutionally may permit jury consideration of net worth or other financial information relating to Defendants;
- (10) lacks constitutionally sufficient standards to be applied by the trial court in post-verdict review of any award of punitive damages or civil penalties;
- (11) lacks constitutionally sufficient standards for appellate review of any award of punitive damages or civil penalties;
- (12) would unconstitutionally impose a penalty, criminal in nature, without according to Defendants the same procedural protections that are accorded to criminal defendants under the constitutions of the United States, this State, and any other state whose laws may apply; and
- (13) otherwise fails to satisfy Supreme Court precedent, including, without limitation, *Pacific Mut. Life Ins. Co. v. Haslip*, 499 U.S. 1 (1991); *TXO Production Corp. v. Alliance Resources, Inc.*, 509 U.S. 443 (1993); *BMW of N. Am. v. Gore*, 517 U.S. 559 (1996); *State Farm Ins. Co. v. Campbell*, 538 U.S. 408 (2003); and *Philip Morris USA v. Williams*, 549 U.S. 346 (2007).

EIGHTY-FIFTH DEFENSE

To the extent that Plaintiff seeks punitive, exemplary, or aggravated damages, any such damages are barred because the product at issue, and its labeling, were subject to and received pre-market approval by the FDA under 52 Stat. 1040, 21 U.S.C. § 301.

EIGHTY-SIXTH DEFENSE

Plaintiff's claims for punitive or exemplary damages are barred because Plaintiff cannot prove by clear and convincing evidence that Walmart was grossly negligent and Walmart has neither acted nor failed to act in a manner that entitles Plaintiff to recover punitive or exemplary damages.

EIGHTY-SEVENTH DEFENSE

Plaintiff cannot obtain relief on its claims based on actions undertaken by Walmart of which Walmart provided notice of all material facts.

EIGHTY-EIGHTH DEFENSE

Walmart is entitled to, and claims the benefit of, all defenses and presumptions set forth in or arising from any rule of law or statute of this State or any other state whose substantive law might control the action.

EIGHTY-NINTH DEFENSE

Walmart asserts all applicable defenses under Federal Rules of Civil Procedure 8(c) and 12(b) and/or Ohio Rules of Civil Procedure 8(C) and 12(B), as investigation and discovery proceeds.

NINETIETH DEFENSE

To the extent they are not otherwise incorporated herein, Walmart incorporates as a defense the defenses and arguments raised in the motions to dismiss of the Manufacturer Defendants, Distributor Defendants, and Pharmacy Defendants in this case.

NINETY-FIRST DEFENSE

Plaintiff's public nuisance claim is precluded by Ohio Rev. Code § 4729.25 and the Ohio Legislature's comprehensive regulation of drugs of abuse.

NINETY-SECOND DEFENSE

Walmart adopts by reference any additional applicable defense pled by any other defendants not otherwise pled herein.

JURY DEMAND

Walmart hereby requests a jury trial as to all issues or claims triable in this action.

PRAYER FOR RELIEF

WHEREFORE, Walmart prays for relief from judgment from Plaintiff as follows:

1. Plaintiff take nothing by reason of this Complaint;
2. Walmart recovers its costs and attorneys' fees incurred herein; and
3. For such further and other relief as the Court deems proper.

Dated: September 21, 2020

Respectfully submitted,

/s/ Tara A. Fumerton

Tara A. Fumerton

Tina M. Tabacchi

JONES DAY

77 West Wacker

Chicago, IL 60601

Phone: (312) 269-4335

Fax: (312) 782-8585

E-mail: tmtabacchi@jonesday.com

E-mail: tfumerton@jonesday.com

Attorneys for Walmart Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 21, 2020, the foregoing was filed using the Court's CM/ECF filing system and will be served via the Court's CM/ECF filing system on all attorneys of record.

/s/ Tara A. Fumerton
Tara A. Fumerton